

#### REMARKS/ ARGUMENTS

By this amendment claims 41-43 have been added; therefore, claims 33-43 are currently pending in the present application. In the instant Office Action, the Examiner has rejected claims 33-40 under 35 U.S.C. § 102(e) as allegedly being anticipated by U.S. Patent No. 6,938,031 to Zoltan et al.

Applicants submit the remaining claims without amendment and respectfully request reconsideration of the present application.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." See MPEP § 2131 (quoting *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987)).

Claim 33 has been amended to state that the mapping module comprises "a content map stored in a memory" and that the one or more record attribute values in the index map are "associated with corresponding ones of the binary data objects of the record chunks." References to "client node", where appropriate, have been changed to "first client node." In addition, Applicants have amended claim 33 to state that the mapping module, based on the received query, "access[es] one or more of the at least one index map to identify a unique message payload identifier corresponding to one or more message payloads that satisfies the query." Similar changes have been made to claim 36.

Zoltan does not anticipate the pending claims. For example, Zoltan does not teach "a content map stored in a memory, the content map comprising one or more content map entries, each content map entry comprising a unique identifier and one or more record chunks associated with the unique identifier, each of the record chunks comprising a binary data object, and at least one index map stored in the memory, the at least one index

map comprising one or more index map entries, each index map entry comprising a unique identifier corresponding to one or more record chunks maintained in the content map and one or more record attribute values associated with corresponding ones of the binary data objects of the record chunks.”

Essentially, the change table of Zoltan is a temporary storage area that indicates the changes to be applied to a data table. As discussed before, Zoltan processes the entries of the change table to make changes to the data table. In contrast, the content map of the present invention associates unique identifiers with a data object, while an index map is an index of attributes that correspond to the data object. The index of attributes in the index map are not changes to or duplicate entries to the entries of the content map as would be the case in Zoltan. Rather, the index map can be searched to identify the data objects in the content map.

In addition, Zoltan does not teach a system that “generate[s] a unique identifier in response to the record insertion request” received from the first client node and “transmit[s] the unique identifier to the first client node.” The Office Action alleges that that the “first client node” in the claims is met in one connection with one limitation by “node 112”, and in connection with another limitation of the same claim by “data store 404.” Specifically, in connection with the limitation “receive a request to insert a record from a first client node,” the Examiner identifies “node 112 of Figure 4.” In connection with the limitation “transmit the unique identifier to the first client node,” the Examiner identifies “data store 404” as being “equivalent to the client node.”

As Applicants have pointed out, Zoltan discloses that row identifiers are abstracted away from client applications and specifically not provided to client nodes. Zoltan actually goes to great lengths to employ a logical data structure 424a to hide the details of the row identifiers to client applications, since the client applications may have difficulty handling them (See Zoltan, Col. 15, lines 31-44; and generally Cols. 15 to 16 (discussion of operation of logical structure 424a)).

The Office Action incorrectly alleges that Applicants are distinguishing Zoltan on the basis of limitations not in the claim language. In particular, Applicants argued that Zoltan does not teaches receiving both record attributes and record chunks from a client node. The Examiner alleges that these features were not recited in the rejected claims. See Office Action at 3. Applicants respectfully request the Examiner to reconsider these contentions. In particular, the limitation “receive an insertion message including the unique identifier and at least one record attribute value” is directed to receiving attribute values from a client. In addition, the limitation “receive record chunks of a data stream corresponding to the unique identifier from the first client node” clearly is directed to receiving record chunks from a client.

Lastly, new claims 41 and 42 are patentably distinguishable from Zoltan, as Zoltan does not teach BLOBS or digital content objects.

Lastly, the remaining dependent claims directly or indirectly depend from claims 33 and 36 respectively and are therefore respectfully submitted to be patentable over the prior art combinations proposed by the Examiner for at least the reasons set forth above with respect to the independent claims. Further, these dependent claims recite additional limitations that when considered in the context of the claimed invention further patentably distinguish the art of record.

The Commissioner is hereby authorized to charge \$130.00 for a one-month extension of time under 37 C.F.R. §1.136(a) fee set forth in 37 C.F.R. §1.17(a)(1) and \$810.00 for a Request for continued examination (RCE) under 37 C.F.R. §1.17(e) and any fee and credit any overpayment to Deposit Account No. 02-0384 of Baker Botts LLP.

Respectfully submitted,  
BAKER BOTTS L.L.P.  
Attorneys for Applicant

A handwritten signature in black ink, appearing to read "Mark Spolyar". The signature is fluid and cursive, with the first name "Mark" and last name "Spolyar" clearly distinguishable.

Mark J. Spolyar  
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